

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

TYSON AND BILLY ARCHITECTS,  
PC

Plaintiff,

VS.

KINGDOM PERSEPECTIVES G.P., LTD  
JIM LAPORTE, and JONATHAN PINO

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Civil Action No. 6:19-CV-0053-JDK-JDL

**DEFENDANT PINO'S ANSWER TO PLAINTIFF'S ORIGINAL COMPLAINT**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Defendant, JONATHAN PINO ("Defendant"), and in response to Plaintiff's Original Complaint, file its Original Answer.

**ANSWER**

By way of response to the specific provisions of Plaintiff's Original Complaint, Defendant would respectfully show as follows:

1. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 1 of Plaintiff's Original Complaint.
2. Defendant denies the allegations in Paragraph 2 of Plaintiff's Original Complaint.
3. Defendant denies the allegations in Paragraph 3 of Plaintiff's Original Complaint.
4. Defendant denies the allegations in Paragraph 4 of Plaintiff's Original Complaint.
5. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 5 of Plaintiff's Original Complaint.
6. Defendant admits the allegations in Paragraph 6 of Plaintiff's Original Complaint.
7. Defendant denies the allegations in Paragraph 7 of Plaintiff's Original Complaint.
8. Defendant denies the allegations in Paragraph 8 of Plaintiff's Original Complaint.

9. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 9 of Plaintiff's Original Complaint.
10. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 10 of Plaintiff's Original Complaint.
11. Defendant denies the allegations in Paragraph 11 of Plaintiff's Original Complaint.
12. Defendant denies the allegations in Paragraph 12 of Plaintiff's Original Complaint.
13. Defendant denies the allegations in Paragraph 13 of Plaintiff's Original Complaint.
14. Defendant admits that he received said letter. Otherwise, Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations the allegations in Paragraph 14 of Plaintiff's Original Complaint.
15. Defendant realleges its responses to Paragraphs 1 through 14.
16. Defendant denies the allegations in Paragraph 16 of Plaintiff's Original Complaint.
17. Defendant denies the allegations in Paragraph 17 of Plaintiff's Original Complaint.
18. Defendant realleges its responses to Paragraphs 1 through 17.
19. Defendant denies the allegations in Paragraph 19 of Plaintiff's Original Complaint.
20. Defendant denies the allegations in Paragraph 20 of Plaintiff's Original Complaint.
21. Defendant denies the allegations in Paragraph 21 of Plaintiff's Original Complaint.
22. Defendant denies the allegations in Paragraph 22 of Plaintiff's Original Complaint.
23. Defendant denies the allegations in Paragraph 23 of Plaintiff's Original Complaint.
24. Defendant denies the allegations in Paragraph 24 of Plaintiff's Original Complaint.
25. Defendant denies the allegations in Paragraph 25 of Plaintiff's Original Complaint.
26. Defendant denies the allegations in Paragraph 26 of Plaintiff's Original Complaint

#### **AFFIRMATIVE DEFENSES**

1. Plaintiff has failed to mitigate its alleged damages.

2. Defendant asserts that he was not a partner in any alleged partnership.
3. In the alternative, any contract Plaintiff alleges was executed by an unauthorized agent.
4. Defendant asserts that some or all of Plaintiff's claims are barred by the equitable doctrine of laches, estoppel or unclean hands.

**PRAYER**

WHEREFORE, Defendant prays that Plaintiff take nothing by reason of this suit and that Defendant be granted all other and further relief to which it may be justly entitled.

Respectfully submitted,

/s/ Eric Kolder  
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ATTORNEY FOR DEFENDANT  
JONATHAN PINO

**OF COUNSEL:**

**RAMEY & FLOCK**  
A Professional Corporation

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service on March 4, 2019. Local Rule CV-5(a)(3)(A).

/s/ Eric Kolder  
ERIC KOLDER